05/02/2012 12:54 2126893315

Case 1:11-cr-00683-NG Document 85 Filed 05/04/12 Page 1 of 1 PageID #: 170PAGE 02/02

GERALD J. DI CHIARA

ATTORNEY AT LAW

3 PARK AVENUE, 15TH FLOOR NEW YORK, NEW YORK 10016

(212) 679-1958

FAX NO. (212) 689-3315

LAURA DI CHIARA, ESQ.

May 2, 2012

FILED

IN CLERK'S OFFICE

MAY 4 - 2012 🖈

BROOKLYN OFFICE

U.S. v. Michael Freeman

11 Cr 683 (NG)

The application is granted. This order shall take effect as work as the docket effects that each mode consents to the proposed and it is a fill

1 S/JO.

USHJ

Dear Magistrate Levy,

225 Cadman Plaza Brooklyn, N.Y. 11201

Via fax (718)613-2623

Honorable Judge James Orenstein United States District Court Eastern District of New York

I am counsel to Michael Freeman, in the above matter. Upon the instruction and with the consent of P.O. Melissa Roman and AUSA Christina M. Posa, I respectfully hereby request that Mr. Freeman's bail restrictions be modified to permit him to travel to Washington, D.C., driving through Delaware, Virginia, and Maryland, on Friday May 4th through Monday May 7th, and thereafter, to visit his friend, Bill Stern residing at 2801 New Mexico Avenue, Apt 1207, Washington, D.C., who, as we understand, is ill with Prostate Cancer, which he has recently been advised, has metastasized.

Re:

Mr. Freeman is currently permitted to travel to Pennsylvania, Massachusetts, Vermont, New Jersey, Connecticut and New York State.

Sincerely,

Gerald I Di Chiara

So Ordered:

cc:

Magistrate Robert M. Levy

AUSA Christina M. Posa/AUSA Anthony Capozzolo

P.O. Melissa Roman